

**Federal Express 8350 0793 8250**

September 20, 2012

Ms. Ingrid H. Hopkins  
Water Protection Division (3WP42)  
US EPA – Region III  
1650 Arch Street  
Philadelphia, PA 19103-3029  
(215) 814-5437  
[hopkins.ingrid@epa.gov](mailto:hopkins.ingrid@epa.gov)

**RE: Benning Road Generating Station – NPDES Permit No. DC 0000094  
Metal Excursion – Outfall 013Q**

Dear Ms. Hopkins,

This letter is a follow-up to the September 18, 2012 telephone notification, made on behalf of Pepco Energy Services, Inc. by Ms. Heather Brinkerhoff of HB Consulting LLC., to report daily maximum copper, iron and zinc excursions from a grab storm water sample taken on September 6, 2012 from Outfall 013.

On September 18, 2012 Ms. Brinkerhoff received the laboratory analysis indicating daily maximum concentrations for copper, iron and zinc were exceeded. Ms. Brinkerhoff made the required telephone notification per NPDES permit condition VI.6 to the USEPA.

Lab and field results indicated the following:

Analyte	Units	Permit Limit Daily Max	Results
Copper	ug/L	13.44	150
Iron	mg/L	1.0	9.2
Zinc	ug/L	117.18	220

Investigation of the metals excursions included a review of historical metal concentrations to obtain baseline storm water sample data. Specifically, storm water sample data gathered during the previous NPDES permit period for the Benning Road Generating Station indicates that the September 6, 2012 values are comparative to historical values, i.e. typical metal concentrations found in storm water samples dating back several years are similar to those seen in recent analysis.

On July 19, 2010, the facility submitted to EPA a TMDL Implementation Plan, as required by NPDES permit condition VII.E. The TMDL Plan provided information on past, current, and planned activities at

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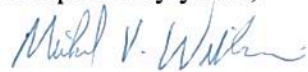
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the facility to meet the required load reductions for the Anacostia River TMDLs for metals. EPA approved the plan and the facility has begun the implementation process, including taking baseline storm water samples from various locations throughout the facility to locate potential hot spots and increased metal infiltration to storm water.

The facility has located and the aforementioned hotspots and has continued the TMDL Implementation Plan process by installing drain screens to potentially help reduce any future metal excursions.

Please contact me at (703) 253-1787 or by electronic mail at [mwilliams@pepcoenergy.com](mailto:mwilliams@pepcoenergy.com) if you need additional information.

Respectfully yours,



Michael V. Williams  
Power Plant Asset Manager  
Pepco Energy Services, Inc.